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*CERTIFIED SPECIALIST-TAXATION LAW TALSO ADMITTED IN GEORGIA

WILLIAM A. COATES

January 24, 1994

Mr. Warren Dickson Environmental Protection Agency Region IV Waste Management Division 345 Courtland Street, N.E. Atlanta, GA 30365

> Re: Exide Corporation - Greer, South Carolina

Dear Mr. Dickson:

It was a pleasure meeting you a couple of weeks ago at Exide. As per your conversation with David Neal, senior plant manager, I am enclosing copies of test results of soil samples taken from the Hight property and the Miller property. You will note that the Hight property samples were taken by the South Carolina Department of Health and Environmental Control in 1986. The Miller samples were taken in 1990 by J.L. Callcott Engineers, at the request of Exide due to a request from Mr. Miller. You will note that these samples indicate that the lead content on both properties is well below the proposed safe super fund cleanup standard of 500-1,000 parts per million. Accordingly, given these levels, I can see no reason for further investigation on either of these properties, and I trust you feel the same way. This is particularly true given the fact that the South Carolina Department of Health and Environmental Control is certainly aware of these levels and has indicated no need for further testing.

You had inquired as to Exide's reason for purchasing the properties as well as the future use of any of the properties. Both Mr. Miller and Mr. Hight brought civil suits against Exide alleging contamination of the property. The Millers and Hights had no evidence of contamination beyond the enclosed findings. Because the properties were contiguous to the Exide property, and in an effort to avoid expensive litigation, Exide agreed to buy the properties, which, in reality, is what both Mr. Hight and Mr. Miller were seeking. Had the properties not been contiguous to Exide property, it is my judgment that Exide would have never agreed to buy the properties, as it would have had no use for them.

Given the condition of the Hight residence, it is anticipated



that it will not be put to any use by Exide. Indeed, it is entirely possible that Exide might choose to bulldoze the Hight house. The Miller property is in considerably better shape. In the past, at other Exide facilities, when Exide has purchased contiguous properties containing habitable structures, Exide has on occasion chosen to rent the properties to one or more employees. While no final decision has been made, it is certainly a possibility that Exide might choose to do the same with this property. Given the levels in the soil, and the fact that the property is on city water, Exide sees no reason why it should not rent the property, should it choose to do so.

I hope that this information has been responsive to your inquiry regarding these two pieces of property. It is my understanding that David Neal has issued an invitation to you to revisit the facility in order to acquaint you with the many additional features which Exide has completed in the last few years. I would echo that invitation, so that you may apprise yourself of the current situation at Exide regarding the addition of these many protection.

Very truly yours,

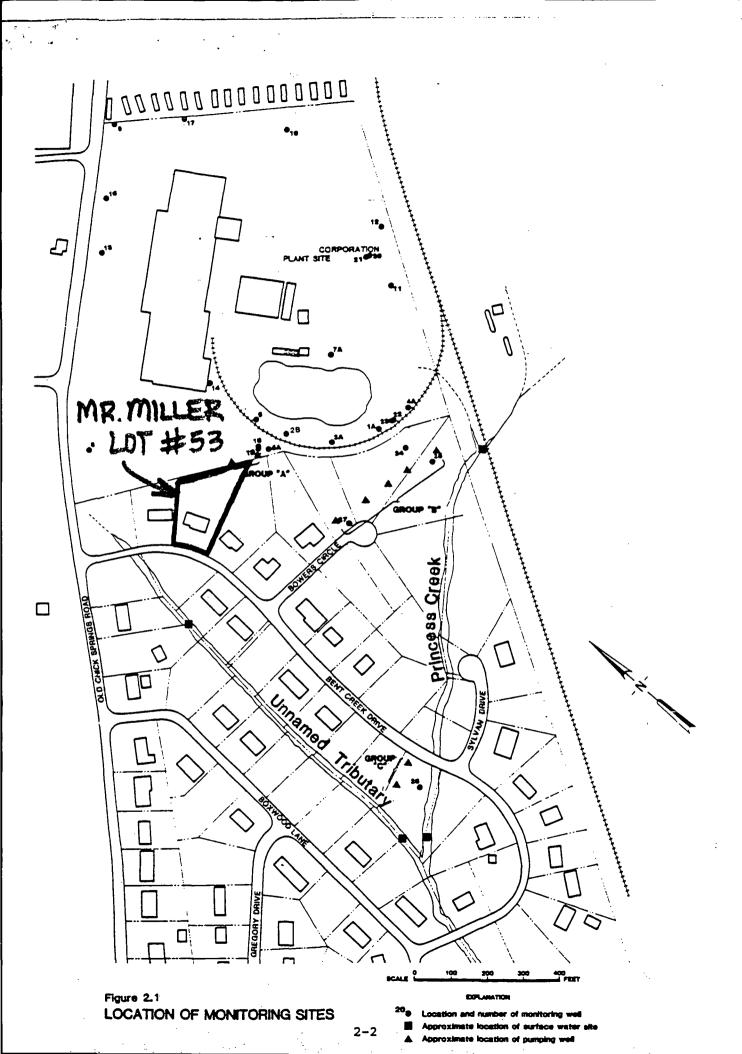
LOVE, THORNTON, ARNOLD & THOMASON, P.A.

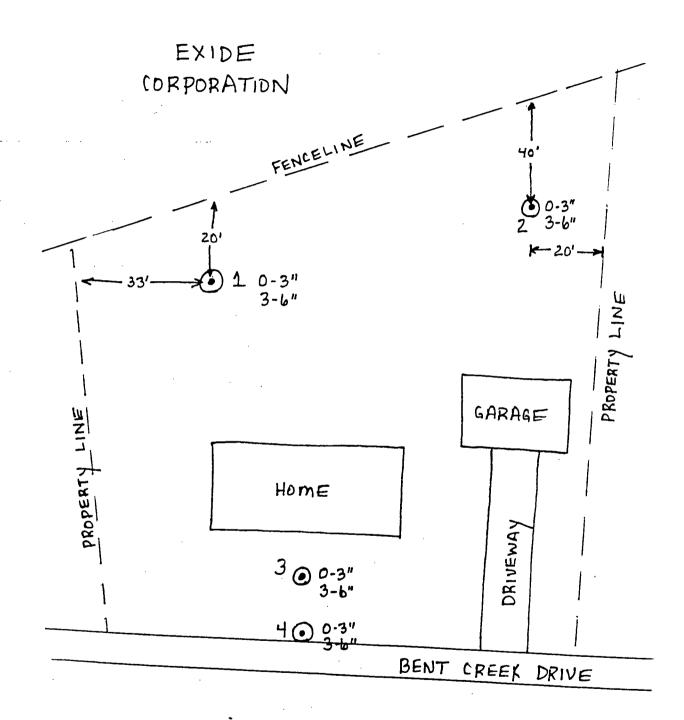
By: William A. Coates

To sele L. Corto

WAC/rms Enclosure

cc: Mr. David Neal





- = SAMPLING LOCATION
- DIMENSIONS APPROXIMATE
- NO SCALE

J. LEED 9/19/90

J. L. ROGERS & CALLCOTT ENGINEERS, INC.

Consulting Engineers

Water & Sewer Design Industrial Wastes Grants & Permits Hazardous Wastes Subdivisions Recreational Facilities P.O.Box 5655 Greenville, S.C. 29606 (803) 232-1556 FAX: 803-233-9058

Laboratory Service

NPDES Monitoring Water Analysis Monitoring Well Analysis Treatability Studies Leachate Analysis Sampling & Pick-up

LABORATORY SERVICES

CLIENT: EXIDE CORPORATION

109 OLD CHICK SPRINGS ROAD

GREER, SC 29651

ATTENTION: MIKE CONNER

DATE RECEIVED: Ø9/19/9Ø

DATE REPORTED: 10/23/90

S.C. DHEC LABORATORY IDENTIFICATION NUMBER - 23105

SAMPLE NUMBER	SAMPLE DESCRIPTION						
83178 83179 83180 83181 83182 83183 83184	LOT 53, # LOT 53, # LOT 53, # LOT 53, # LOT 53, #	2, Ø-3" ON 2, 3-6" ON 3, Ø-3" ON 3, 3-6" ON	9/19 @ 14 9/19 @ 15 9/19 @ 15 9/19 @ 15 9/19 @ 15	45 SOIL 00 SOIL 10 SOIL 10 SOIL 10 SOIL 25 SOIL			
PARAMETER	RESULT						
	83178	83179	83180	83181			
LEAD	23	24	306	231			
	83182	83183	83184	83185			
LEAD	94	34	138	24			

RESULTS IN MILLIGRAMS PER KILOGRAM (mg/kg) UNLESS OTHERWISE NOTED.

REPORTED BY:

SAM W. AVERY, LABORATORY MANAGER



ROGERS & CALLCOTT ENGINEERS INC.

CHAIN OF CUSTODY RECORD

PAGE	OF	

P.O. Box 5655, Greenville, SC 29606 Phone (803) 232-1556 • FAX (803) 233-9058								77	777	Filte	red (Yes/No)
Client Name Exide						/	A	1//	///	Pres	erved (Code)
Address Greet					_	N	/	///		Refrigera	ted (Yes/No)
	Contain				16	/		///		Sample type (Grai	b/Composite)
Attention Jack Branton	Ö			15	o)	\mathbb{Z}	\angle		Sampl	e source (WW, GV	V, DW, other)
Telephone No FAX No	Number	7/8	ariory		//	/	//			Preserva	ition Code:
R & C Vr 20 Lab No. Date Time Sample Station ID	Total N	10° 4		/	_			Com	nents:		D-NeOH E-HCL F
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83179 9-19 5:45 Lot 53, #1, 3-6"	1	1							//		
83180 9-19 3:00 Lot 53 # 2 0 - 3"] <u>,</u>		<u> </u>						,,		
83181 7-19 3:00 Lot 53 #2, 3-6"	1								<i>l</i> • .		
83182 9-19 3:10 Lot 53 #3 0-3"	1								71/		
83183 9193:10 Lot 53 #3, 3-6"	1	1							<i>!</i> ·		
83184 9-193:25 Lot 53 #4 0-3"	1								٨.		
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SAMPLER Properties Date/Time Received by (Sig.) (2) Taxa Shipper Name A #		on 9/1		9/19	Date/Time 9/19/90 1610		HAZARDS ASSOCIATED WITH SAMPLES				
Relinquished by (Sig.) Date/Time Received by (Sig.) Shipper Name & #	1		Date/Time								
Relinquished by (Sig.) Date/Time Received by (Sig.) (6) Shipper Name & #			Date/Time		Receipt Total CImg/L Receipt pH Client P O Number (Check)						
Seal # at'chd by Recvd. Intact by Seal # Form Revised August 1989		at'chd	by (R	lecvd.	Intact	 	le Resubmitted		

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Mn mg/kg	01053									
Ni mg/kg /////	01068	5.0 < 5.0								
Pb mg/kg	01052 2	0 41								
Zn mg/kg 😥	01093	9 1 67			. •					
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Date Released from Regional Laboratory Political By Y The Property By										
ved in Central Laboratory By AMT Date Received 4-29-50										
Date Released from Analytical Services Central Laboratory (c - 1 1 8(c										
Released By 1) 1) Dir my x										
An "X" in the small column indicates test requested.										

White-Central Office; Canary-District Office; Pink-ASD Central Lab

TYPE: Primary () Secondary () Special ()

If Special, Name of Study

Date 4-25-86 Collected By ...

Station No.

% Moisture

% Volatile Solids

mg/kg

11 ε Grease mg/kg

DHEC 40-14 (10/80)

Time Collected

Lab No.

рΗ

